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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$70,000.00 SEIZED
FROM CHASE BANK ACCOUNT
15 NUMBER 9343714245, HELD IN THE
NAME OF RICHARD A. ABRUSCI DBA
16 RESOLUTION ARRANGEMENT
SERVICES,
17

18 APPROXIMATELY \$38,582.49 SEIZED
FROM TD AMERITRADE ACCOUNT
19 NUMBER 756-362930, HELD IN THE
NAME OF RICHARD ABRUSCI,
20

21 APPROXIMATELY \$3,061.65 SEIZED
FROM WELLS FARGO BANK
22 ACCOUNT NUMBER 6214166578, HELD
IN THE NAMES OF RICHARD ABRUSCI
AND KENICHIRO HELLER,
23

24 APPROXIMATELY \$2,194.88 SEIZED
FROM WELLS FARGO BANK
25 ACCOUNT NUMBER 8369598159, HELD
IN THE NAME OF RICHARD ABRUSCI,
26

27 APPROXIMATELY \$383.22 SEIZED
FROM WELLS FARGO BANK
28 ACCOUNT NUMBER 3171291978, HELD
IN THE NAME OF PALM HOUSING,
LLC,

CASE NO.

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

1 APPROXIMATELY \$274.06 SEIZED
2 FROM WELLS FARGO BANK
3 ACCOUNT NUMBER 5572048543, HELD
4 IN THE NAME OF RICHARD ABRUSCI,
5 and

6 APPROXIMATELY \$88.20 SEIZED
7 FROM WELLS FARGO BANK
8 ACCOUNT NUMBER 5271925306, HELD
9 IN THE NAME OF RICHARD ABRUSCI,
10

Defendants.

11 It is hereby stipulated by and between the United States of America, by and through its
12 undersigned counsel and claimant Richard Abrusci ("Abrusci" or "claimant"), appearing *in propria*
13 *persona*, as follows:

14 1. On or about May 23, 2023, claimant Richard Abrusci filed a claim in the administrative
15 forfeiture proceedings with the Internal Revenue Service with respect to the Approximately \$70,000.00
16 seized from Chase Bank Account Number 9343714245, held in the name of Richard A. Abrusci dba
17 Resolution Arrangement Services, Approximately \$38,582.49 seized from TD Ameritrade Account
18 Number 756-362930, held in the name of Richard Abrusci, Approximately \$3,061.65 seized from Wells
19 Fargo Bank Account Number 6214166578, held in the names of Richard Abrusci and Kenichiro Heller,
20 Approximately \$2,194.88 seized from Wells Fargo Bank Account Number 8369598159, held in the name
21 of Richard Abrusci, Approximately \$383.22 seized from Wells Fargo Bank Account Number
22 3171291978, held in the name of Palm Housing, LLC, Approximately \$274.06 seized from Wells Fargo
23 Bank Account Number 5572048543, held in the name of Richard Abrusci, and Approximately \$88.20
24 seized from Wells Fargo Bank Account Number 5271925306, held in the name of Richard Abrusci
25 (hereafter "defendant funds"), which were seized on February 1, 2023.

26 2. The United States represents that the Internal Revenue Service has sent the written notice
27 of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has
28 expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and
no person other than the claimant has filed a claim to the defendant funds as required by law in the
administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

1 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are
2 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
3 proceedings, unless the court extends the deadline for good cause shown or by agreement of the parties.
4 That deadline is August 21, 2023.

5 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
6 to November 20, 2023, the time in which the United States is required to file a civil complaint for
7 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are
8 subject to forfeiture.

9 5. Accordingly, the parties agree that the deadline by which the United States shall be
10 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment
11 alleging that the defendant funds are subject to forfeiture shall be extended to November 20, 2023.

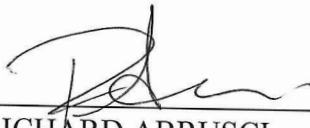
12 Dated: August 2, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ Lynn Trinka Ernce

LYNN TRINKA ERNCE
Assistant U.S. Attorney

16
17 Dated: 28 July, 2023


RICHARD ABRUSCI
Claimant
Appearing *in propria persona*
P.O. Box 10626
South Lake Tahoe, CA 96158

21 **IT IS SO ORDERED.**

22 Dated: _____

UNITED STATES DISTRICT JUDGE